

EXHIBIT 7

SEEGER WEISS LLP
CHRISTOPHER A. SEEGER
DAVID R. BUCHANAN
55 Challenger Road, 6th Floor
Ridgefield Park, NJ 07660
Telephone: 212/584-0700
212/584-0799 (fax)

Local Counsel

ROBBINS GELLER RUDMAN
& DOWD LLP
JAMES E. BARZ
FRANK A. RICHTER
200 South Wacker Drive, 31st Floor
Chicago, IL 60606
Telephone: 312/674-4674
312/674-4676 (fax)

Lead Counsel for Plaintiffs

UNITED STATES DISTRICT COURT

DISTRICT OF NEW JERSEY

In re VALEANT PHARMACEUTICALS)	Master No. 3:15-cv-07658-MAS-LHG
INTERNATIONAL, INC. SECURITIES)	
LITIGATION)	<u>CLASS ACTION</u>
_____)	
This Document Relates To:)	Judge Michael A. Shipp
)	Magistrate Judge Lois H. Goodman
SECURITIES CLASS ACTION)	Special Master Dennis M. Cavanaugh,
)	U.S.D.J. (ret.)
_____)	
)	DECLARATION OF
)	CHRISTOPHER A. SEEGER IN
)	SUPPORT OF REPLY IN SUPPORT
)	OF PLAINTIFF'S MOTION FOR
)	LEAVE TO AMEND COMPLAINT

CHRISTOPHER A. SEEGER, under penalty of perjury, declares and certifies as follows:

1. I am a member of the bar of the State of New Jersey and am admitted to practice before this Court. I am a member of the law firm of Seeger Weiss LLP, one of the counsel of record for Lead Plaintiff in the above-entitled action. I have personal knowledge of the matters stated herein and, if called upon, I could and would competently testify thereto.

2. Attached are true and correct copies of the following exhibits:

- Exhibit 1: Document production cover letter from Kenneth Y. Turnbull to Robert R. Henssler, Jr., dated July 25, 2017;
- Exhibit 2: Document production cover letter from Kenneth Y. Turnbull to Robert R. Henssler, Jr., dated August 18, 2017;
- Exhibit 3: Document production cover letter from Kenneth Y. Turnbull to Robert R. Henssler, Jr., dated October 13, 2017;
- Exhibit 4: Document production cover letter from Kenneth Y. Turnbull to Robert R. Henssler, Jr., dated December 22, 2017;
- Exhibit 5: Document production cover letter from Kenneth Y. Turnbull to Robert R. Henssler, Jr., dated January 18, 2018;
- Exhibit 6: Document production cover letter from Kenneth Y. Turnbull to Robert R. Henssler, Jr., dated June 26, 2018;
- Exhibit 7: Document production cover letter from Kenneth Y. Turnbull to Robert R. Henssler, Jr., dated August 16, 2018;
- Exhibit 8: Document production cover letter from Kenneth Y. Turnbull to Robert R. Henssler, Jr., dated August 31, 2018; and

Exhibit 9: Document production cover letter from Kenneth Y. Turnbull to Robert R. Henssler, Jr., dated November 26, 2019.

In accordance with 28 U.S.C. §1746, I hereby declare under penalty of perjury that the foregoing is true and correct.

DATED: March 19, 2020

s/ Christopher A. Seeger

CHRISTOPHER A. SEEGER

EXHIBIT 1

KING & SPALDING

King & Spalding LLP
1185 Avenue of the Americas
New York, NY 10036-4003
Tel: +1 212 556 2100
Fax: +1 212 556 2222
www.kslaw.com

Kenneth Y. Turnbull
Direct Dial: +1 202 626 2644
Direct Fax: +1 202 626 3737
kturnbull@kslaw.com

July 25, 2017

VIA OVERNIGHT DELIVERY

Robert R. Henssler, Jr.
Robbins Geller Rudman & Dowd LLP
655 West Broadway, Suite 1900
San Diego, CA 92101

Re: *In re Valeant Pharmaceuticals International, Inc. Securities Litigation, No. 3:15-cv-07658-MAS-LHG*

Dear Counsel:

On behalf of PricewaterhouseCoopers LLP ("PwC"), we are producing the enclosed documents in partial response to Plaintiffs' First Request for Production of Documents to Defendant PwC, dated May 5, 2017. Specifically, we are producing electronic and external audit working papers associated with PwC's annual audits and quarterly reviews of the financial statements of Valeant Pharmaceuticals International, Inc. ("Valeant") for the fiscal year ending December 31, 2014. Our production is further described in, and made pursuant to, PwC's Responses and Objections to Plaintiffs' First Request for Production of Documents, dated June 5, 2017 ("Responses and Objections").

We are producing the documents on the enclosed hard drive, labeled PwC_VPI_DNJ_001, which includes fixed image TIFF, OCR text, and native Excel files, as well as load files compatible with Relativity, Concordance and Summation. The hard drive is encrypted with a password protected self-extracting zip file. The password will be provided separately. Both the hard drive and the TIFF images it contains have been marked "Confidential" pursuant to the terms of the Stipulation and Confidentiality Order entered by the Court on July 18, 2017 and should be treated accordingly. Please also note that, while it is impractical for us to label the native Excel files with a confidentiality designation, they are confidential and should be treated accordingly. Please also note that these native files are subject to inadvertent alteration during the course of your review.

July 25, 2017

Page 2

Electronic Work Papers

The Bates ranges associated with these documents are as follows:

Electronic Database	Bates Range
Valeant Pharmaceuticals International, Inc. 2014 Q1 Review	PwC_VPI_DNJ_00000001 - PwC_VPI_DNJ_00004428
Valeant Pharmaceuticals International, Inc. 2014 Q2 Review	PwC_VPI_DNJ_00004750 - PwC_VPI_DNJ_00009728
Valeant Pharmaceuticals International, Inc. 2014 Q3 Review	PwC_VPI_DNJ_00010193 - PwC_VPI_DNJ_00014852
Valeant Pharmaceuticals International, Inc. 2014 Audit	PwC_VPI_DNJ_00015522 - PwC_VPI_DNJ_00068736

External Work Papers

The Bates ranges associated with these documents are as follows:

External Workpapers	Bates Range
Valeant Pharmaceuticals International, Inc. 2014 Q1 Review	PwC_VPI_DNJ_00004429 - PwC_VPI_DNJ_00004749
Valeant Pharmaceuticals International, Inc. 2014 Q2 Review	PwC_VPI_DNJ_00009729 - PwC_VPI_DNJ_00010192
Valeant Pharmaceuticals International, Inc. 2014 Q3 Review	PwC_VPI_DNJ_00014853 - PwC_VPI_DNJ_00015521
Valeant Pharmaceuticals International, Inc. 2014 Audit	PwC_VPI_DNJ_00068737 - PwC_VPI_DNJ_00070380

We have redacted certain material from the documents on the grounds of PwC's attorney-client privilege and will provide a privilege log for such documents. Additionally, Valeant has asserted privilege over certain documents and will also provide a privilege log.

We are continuing to review and process additional documents for production.

* * * *

PwC does not intend to, and does not, waive any applicable privilege or other legal basis under which information may not be subject to production, whether such privilege or protection is held by PwC or its clients. If it were found that production of any of the information contained herein constitutes disclosure of otherwise privileged matters, such disclosure would be inadvertent and subject to the claw-back provision in paragraph 2 of the Confidentiality Order.

July 25, 2017
Page 3

If you have any questions, please feel free to contact me or my colleague Christina Conroy (212-556-2123).

Sincerely,

A handwritten signature in black ink, reading "Kenneth Y. Turnbull". The signature is written in a cursive, slightly slanted style.

Kenneth Y. Turnbull

Enclosures

EXHIBIT 2

King & Spalding LLP
1185 Avenue of the Americas
New York, NY 10036-4003
Tel: +1 212 556 2100
Fax: +1 212 556 2222
www.kslaw.com

Kenneth Y. Turnbull
Direct Dial: +1 202 626 2644
Direct Fax: +1 202 626 3737
kturnbull@kslaw.com

August 18, 2017

VIA EMAIL

Robert R. Henssler, Jr.
Robbins Geller Rudman & Dowd LLP
655 West Broadway, Suite 1900
San Diego, CA 92101

Re: *In re Valeant Pharmaceuticals International, Inc. Securities Litigation, No. 3:15-cv-07658-MAS-LHG*

Dear Counsel:

On behalf of PricewaterhouseCoopers LLP (“PwC”), we are producing the enclosed documents in partial response to Plaintiffs’ First Request for Production of Documents to Defendant PwC, dated May 5, 2017. Specifically, we are producing electronic and external audit working papers associated with PwC’s annual audits and quarterly reviews of the financial statements of Valeant Pharmaceuticals International, Inc. (“Valeant”) for the fiscal year ending December 31, 2015. Valeant has asserted privilege over certain documents and will provide a privilege log. Our production is further described in, and made pursuant to, PwC’s Responses and Objections to Plaintiffs’ First Request for Production of Documents, dated June 5, 2017 (“Responses and Objections”).

We are producing the documents via FTP in a multi-part RAR file labeled PwC_VPI_DNJ_002, which includes fixed image TIFF, OCR text, and native Excel files, as well as load files compatible with Relativity, Concordance and Summation. The self-extracting zip file is encrypted for added security. The access information and password will be provided separately. Both the zip files and the TIFF images they contain have been marked “Confidential” pursuant to the terms of the Stipulation and Confidentiality Order entered by the Court on July 18, 2017 and should be treated accordingly. Please also note that, while it is impractical for us to label the native Excel files with a confidentiality designation, they are also confidential and should be treated as such. Please also note that these native files are subject to inadvertent alteration during the course of your review.

August 18, 2017

Page 2

Electronic Work Papers

The Bates ranges associated with these documents are as follows:

Electronic Database	Bates Range
Valeant Pharmaceuticals International, Inc. 2015 Q1 Review	PwC_VPI_DNJ_00070381 - PwC_VPI_DNJ_00076327
Valeant Pharmaceuticals International, Inc. 2015 Q2 Review	PwC_VPI_DNJ_00076699 - PwC_VPI_DNJ_00080988
Valeant Pharmaceuticals International, Inc. 2015 Q3 Review	PwC_VPI_DNJ_00081425 - PwC_VPI_DNJ_00086666
Valeant Pharmaceuticals International, Inc. 2015 Audit	PwC_VPI_DNJ_00087117 - PwC_VPI_DNJ_00144169
Valeant Pharmaceuticals International, Inc. 2015 Audit – Ad Hoc Committee	PwC_VPI_DNJ_00146263 - PwC_VPI_DNJ_00151947

External Work Papers

The Bates ranges associated with these documents are as follows:

External Workpapers	Bates Range
Valeant Pharmaceuticals International, Inc. 2015 Q1 Review	PwC_VPI_DNJ_00076328 - PwC_VPI_DNJ_00076698
Valeant Pharmaceuticals International, Inc. 2015 Q2 Review	PwC_VPI_DNJ_00080989 - PwC_VPI_DNJ_00081424
Valeant Pharmaceuticals International, Inc. 2015 Q3 Review	PwC_VPI_DNJ_00086667 - PwC_VPI_DNJ_00087116
Valeant Pharmaceuticals International, Inc. 2015 Audit	PwC_VPI_DNJ_00144170 - PwC_VPI_DNJ_00146262

Valeant has asserted privilege over certain documents and will provide a privilege log.

* * * *

PwC does not intend to, and does not, waive any applicable privilege or other legal basis under which information may not be subject to production, whether such privilege or protection is held by PwC or its clients. If it were found that production of any of the information contained herein constitutes disclosure of otherwise privileged matters, such disclosure would be inadvertent and subject to the claw-back provision in paragraph 2 of the Confidentiality Order.

August 18, 2017

Page 3

If you have any questions, please feel free to contact me or my colleague Christina Conroy (212-556-2123).

Sincerely,

A handwritten signature in black ink, reading "Kenneth Y. Turnbull". The signature is written in a cursive, flowing style.

Kenneth Y. Turnbull

Enclosures

EXHIBIT 3

KING & SPALDING

King & Spalding LLP
1700 Pennsylvania Avenue, NW
Washington, DC 20006-4707
Tel: +1 202 737 0500
Fax: +1 202 626 3737
www.kslaw.com

Kenneth Y. Turnbull
Partner
Direct Dial: +1 202 626 2644
kturnbull@kslaw.com

October 13, 2017

Via e-mail

Robert R. Henssler, Jr.
Robbins Geller Rudman & Dowd LLP
655 West Broadway, Suite 1900
San Diego, CA 92101

Re: *In re Valeant Pharmaceuticals International, Inc. Securities Litigation, No. 3:15-cv-07658-MAS-LHG*

Dear Bobby:

On behalf of PricewaterhouseCoopers LLP (“PwC”), we are producing the enclosed documents in further response to Plaintiffs’ First Request for Production of Documents to PwC, dated May 5, 2017. Specifically, and in accordance with PwC’s Responses and Objections to Plaintiffs’ First Request, dated June 5, 2017, we are producing e-mails and electronic documents from 2014 for the below-listed PwC professionals that PwC previously produced to the Investigating Agencies.¹ In response to your informal e-mail request on September 13, we are also producing PwC’s Accounting and Reporting Manual, section 1175, from the time period of the workpaper referred to in your e-mail (Bates-labeled PwC_VPI_DNJ_00151948 – 966).

We are producing the documents via FTP in a multi-part RAR file labeled PwC_VPI_DNJ_003, which includes fixed image TIFF, OCR text, and native Excel files, as well as load files compatible with Relativity, Concordance, and Summation. The self-extracting zip file is encrypted for added security. The access information and password will be provided separately. Both the zip files and the TIFF images they contain have been marked “Confidential” pursuant to the terms of the Stipulation and Confidentiality Order entered by the Court on July 18, 2017 and should be treated accordingly. Please also note that, while it is impractical for us to label the native Excel files with a confidentiality designation, they are also confidential and should be treated as such. Please also note that these native files are subject to inadvertent alteration during the course of your review.

¹ In the course of reviewing this production, we identified certain non-responsive documents, not related to Valeant, that were inadvertently produced to the Investigating Agencies. We have not re-produced those non-responsive documents in this production.

October 13, 2017

Page 2

The custodians and Bates ranges associated with these documents are as follows:

Custodian	Bates Range
Gerry Flynn	PwC VPI DNJ 00151967 - PwC VPI DNJ 00155608
Jonathan Hirschfeld	PwC VPI DNJ 00155609 - PwC VPI DNJ 00193345
Stephen McIlwraith	PwC VPI DNJ 00193346 - PwC VPI DNJ 00199310
Hitean Parmar	PwC VPI DNJ 00199311 - PwC VPI DNJ 00199314
Eitan Zamir	PwC VPI DNJ 00199315 - PwC VPI DNJ 00263504

We have withheld certain documents and redacted certain material on the grounds of PwC's attorney-client privilege and will provide a privilege log for such documents. Additionally, Valeant has asserted privilege over certain documents and will also provide a privilege log.

Finally, we are producing an overlay file for PwC_VPI_DNJ_00136676, which was previously produced on July 25, 2017, to correct a prior redaction that was inadvertently altered from PwC's production to the Investigating Agencies. This overlay file is contained in a RAR file labeled PwC_VPI_DNJ_OLAY002. The access information and password will be provided separately.

* * * *

PwC does not intend to, and does not, waive any applicable privilege or other legal basis under which information may not be subject to production, whether such privilege or protection is held by PwC or its clients. If it were found that production of any of the information contained herein constitutes disclosure of otherwise privileged matters, such disclosure would be inadvertent and subject to the claw-back provision in paragraph 2 of the Confidentiality Order.

If you have any questions, please feel free to contact me or my colleague Christina Conroy (212-556-2123).

Sincerely,



Kenneth Y. Turnbull

Enclosures

EXHIBIT 4

KING & SPALDING

King & Spalding LLP
1700 Pennsylvania Avenue, NW
Washington, DC 20006-4707
Tel: +1 202 737 0500
Fax: +1 202 626 3737
www.kslaw.com

Kenneth Y. Turnbull
Partner
Direct Dial: +1 202 626 2644
kturnbull@kslaw.com

December 22, 2017

Via e-mail

Robert R. Henssler, Jr.
Robbins Geller Rudman & Dowd LLP
655 West Broadway, Suite 1900
San Diego, CA 92101

Re: *In re Valeant Pharmaceuticals International, Inc. Securities Litigation, No. 3:15-cv-07658-MAS-LHG*

Dear Bobby:

On behalf of PricewaterhouseCoopers LLP (“PwC”), we are producing the enclosed documents in further response to Plaintiffs’ First Request for Production of Documents to PwC, dated May 5, 2017. Specifically, and in accordance with PwC’s June 5, 2017 Responses and Objections to Plaintiffs’ First Request and our previous discussions, we are producing e-mails and electronic documents from calendar-year 2015 for the below-listed PwC professionals that PwC previously produced to the Investigating Agencies.¹ Consistent with Jim Barz’s representation on November 28, 2017, this production and PwC’s prior productions in this action are not to be shared with the direct action plaintiffs.

We are producing the documents via FTP in a multi-part RAR file labeled PwC_VPI_DNJ_004, which includes fixed image TIFF, OCR text, and native Excel files, as well as load files compatible with Relativity, Concordance, and Summation. The self-extracting zip file is encrypted. We will provide the access information and password separately. Both the zip files and the TIFF images they contain have been marked “Confidential” pursuant to the terms of the July 18, 2017 Stipulation and Confidentiality Order and should be treated accordingly. Please also note that, while it is impractical for us to label the native Excel files with a confidentiality designation, they are also confidential and should be treated as such. Please also note that these native files are subject to inadvertent alteration during the course of your review.

¹ In the course of reviewing this production, we identified certain non-responsive information, not related to Valeant, that was inadvertently produced to the Investigating Agencies. We have not re-produced that non-responsive information in this production.

December 22, 2017

Page 2

The custodians and Bates ranges associated with these documents are as follows:

Custodian	Bates Range
Gerry Flynn	PwC VPI DNJ 00263505 - PwC VPI DNJ 00268516
Jonathan Hirschfeld	PwC VPI DNJ 00268517 - PwC VPI DNJ 00298615
Stephen Mcilwraith	PwC VPI DNJ 00298616 - PwC VPI DNJ 00308632
Hitean Parmar	PwC VPI DNJ 00308633 - PwC VPI DNJ 00323263
Eitan Zamir	PwC VPI DNJ 00323264 - PwC VPI DNJ 00396376

We have withheld certain documents and redacted certain material on the grounds of PwC's attorney-client privilege and will provide a privilege log for such documents. Additionally, Valeant has asserted attorney work-product protection over certain documents and will also provide a log.

* * * *

PwC does not intend to, and does not, waive any applicable privilege or other legal basis under which information may not be subject to production, whether such privilege or protection is held by PwC or its clients. If it were found that production of any of the information contained herein constitutes disclosure of otherwise privileged matters, such disclosure would be inadvertent and subject to the claw-back provision in paragraph 2 of the Confidentiality Order.

If you have any questions, please feel free to contact me or Christina Conroy (212-556-2123).

Sincerely,



Kenneth Y. Turnbull

Enclosures

EXHIBIT 5

KING & SPALDING

King & Spalding LLP
1700 Pennsylvania Avenue, NW
Washington, DC 20006-4707
Tel: +1 202 737 0500
Fax: +1 202 626 3737
www.kslaw.com

Kenneth Y. Turnbull
Partner
Direct Dial: +1 202 626 2644
kturnbull@kslaw.com

January 18, 2018

Via e-mail

Robert R. Henssler, Jr.
Robbins Geller Rudman & Dowd LLP
655 West Broadway, Suite 1900
San Diego, CA 92101

Re: *In re Valeant Pharmaceuticals International, Inc. Securities Litigation, No. 3:15-cv-07658-MAS-LHG*

Dear Bobby:

On behalf of PricewaterhouseCoopers LLP (“PwC”), we are producing the enclosed documents in further response to Plaintiffs’ First Request for Production of Documents to PwC, dated May 5, 2017. Specifically, and in accordance with our previous discussions, we are producing e-mails and electronic documents from calendar-year 2013 for the below-listed PwC professionals that PwC previously produced to the Investigating Agencies.¹ Consistent with Jim Barz’s representation on November 28, 2017, this production and PwC’s prior productions in this action are not to be shared with the direct action plaintiffs.

We are producing the documents via FTP in a RAR file labeled PwC_VPI_DNJ_005, which includes fixed image TIFF, OCR text, and native Excel files, as well as load files compatible with Relativity, Concordance, and Summation. The self-extracting zip file is encrypted. We will provide the access information and password separately. Both the zip files and the TIFF images they contain have been marked “Confidential” pursuant to the terms of the July 18, 2017 Stipulation and Confidentiality Order and should be treated accordingly. Please also note that, while it is impractical for us to label the native Excel files with a confidentiality designation, they are also confidential and should be treated as such. Please also note that these native files are subject to inadvertent alteration during the course of your review.

¹ In the course of reviewing this production, we identified certain non-responsive information, not related to Valeant, that was inadvertently produced to the Investigating Agencies. We have not re-produced that non-responsive information in this production.

January 18, 2018

Page 2

The custodians and Bates ranges associated with these documents are as follows:

Custodian	Bates Range
Gerry Flynn	PwC VPI DNJ 00396377 - PwC VPI DNJ 00399955
Jonathan Hirschfeld	PwC VPI DNJ 00399956 - PwC VPI DNJ 00426001
Stephen Mcilwraith	PwC VPI DNJ 00426002 - PwC VPI DNJ 00426004
Hitean Parmar	PwC VPI DNJ 00426005 - PwC VPI DNJ 00426288
Eitan Zamir	PwC VPI DNJ 00426289 - PwC VPI DNJ 00427497

Valeant has withheld certain documents and redacted certain material on the grounds of work-product protection and will provide a privilege log for such documents.

* * * *

PwC does not intend to, and does not, waive any applicable privilege or other legal basis under which information may not be subject to production, whether such privilege or protection is held by PwC or its clients. If it were found that production of any of the information contained herein constitutes disclosure of otherwise privileged matters, such disclosure would be inadvertent and subject to the claw-back provision in paragraph 2 of the Confidentiality Order.

If you have any questions, please feel free to contact me or Christina Conroy (212-556-2123).

Sincerely,



Kenneth Y. Turnbull

Enclosures

EXHIBIT 6

KING & SPALDING

King & Spalding LLP
1700 Pennsylvania Avenue, NW
Washington, DC 20006-4707
Tel: +1 202 737 0500
Fax: +1 202 626 3737
www.kslaw.com

Kenneth Y. Turnbull
Partner
Direct Dial: +1 202 626 2644
kturnbull@kslaw.com

June 26, 2018

Via e-mail

Robert R. Henssler, Jr.
Robbins Geller Rudman & Dowd LLP
655 West Broadway, Suite 1900
San Diego, CA 92101

Re: *In re Valeant Pharmaceuticals International, Inc. Securities Litigation, No. 3:15-cv-07658-MAS-LHG*

Dear Bobby:

On behalf of PricewaterhouseCoopers LLP (“PwC”), we are producing additional documents in response to Plaintiffs’ First Request for Production of Documents, dated May 5, 2017 (“Plaintiffs’ First Request”). This production consists of documents that PwC has recently produced to one of the Investigative Agencies. Through this letter, we are amending PwC’s June 5, 2017 Responses and Objections to Plaintiffs’ First Request (“PwC’s June 5, 2017 Responses”) to reflect that PwC is producing a broader scope of documents than set forth in those responses.

First, we are producing e-mails and electronic documents identified based on the same custodians and using the same search terms set forth in Appendix A to PwC’s June 5, 2017 Responses, with an extended date range of November 18, 2015 to April 29, 2016. These parameters are set forth in Appendix A below. These documents bear the following Bates numbers:

Custodian	Bates Range
Flynn, Gerry	PwC_VPI_DNJ_00493337 - 00494497
Hirschfeld, Jonathan	PwC_VPI_DNJ_00494498 - 00502477
Mcilwraith, Stephen	PwC_VPI_DNJ_00502478 - 00502622
Parmar, Hitean	PwC_VPI_DNJ_00502623 - 00528731
Zamir, Eitan	PwC_VPI_DNJ_00528732 - 00550177

Second, we are producing e-mails and electronic documents identified based on the custodians, search terms, and date range set forth in Appendix B below. These documents bear the following Bates numbers:

June 26, 2018

Page 2

Custodian	Bates Range
William Coffey	PwC VPI DNJ 00430074 - 00430190
Gerry Flynn	PwC VPI DNJ 00430191 - 00433070
Jon Gochoco	PwC VPI DNJ 00433071 - 00433171
Jonathan Hirschfeld	PwC VPI DNJ 00433172 - 00442735
Matthew Magi	PwC VPI DNJ 00442736 - 00449032
Stephen Mcilwraith	PwC VPI DNJ 00449033 - 00449347
Ariel Miller	PwC VPI DNJ 00449348 - 00451409
Hitean Parmar	PwC VPI DNJ 00451410 - 00461972
Alina Ramirez	PwC VPI DNJ 00461973 - 00464961
Gary Sardo	PwC VPI DNJ 00464962 - 00480685
Eitan Zamir	PwC VPI DNJ 00480686 - 00486445
Brooke Zankel	PwC VPI DNJ 00486446 - 00493336

Consistent with Jim Barz's representation on November 28, 2017, this production and PwC's prior productions in this action are not to be shared with the direct action plaintiffs. We have not withheld or redacted any documents from this production based on an assertion of privilege or work product protection by PwC or Valeant.

We are producing these documents via FTP in a multipart RAR file labeled PwC_VPI_DNJ_008, which includes fixed image TIFF, OCR text, and native Excel files, as well as load files compatible with Relativity, Concordance, and Summation. The self-extracting zip files are encrypted. We will provide the access information and password separately. Both the zip files and the TIFF images they contain have been marked "Confidential" pursuant to the terms of the July 18, 2017 Stipulation and Confidentiality Order and should be treated accordingly. Please note that, while it is impractical for us to label the native Excel files with a confidentiality designation, they are also confidential and should be treated as such. Please also note that these native files are subject to inadvertent alteration during the course of your review.

* * * *

PwC does not intend to, and does not, waive any applicable privilege or other legal basis under which information may not be subject to production, whether such privilege or protection is held by PwC or its clients. If it were found that production of any of the information contained herein constitutes disclosure of otherwise privileged matters, such disclosure would be inadvertent and subject to the claw-back provision in paragraph 2 of the Confidentiality Order.

June 26, 2018

Page 3

If you have any questions, please feel free to contact me.

Sincerely,

A handwritten signature in black ink, reading "Kenneth Y. Turnbull". The signature is written in a cursive, flowing style.

Kenneth Y. Turnbull

Enclosures

June 26, 2018

Page 4

APPENDIX A

Date range: 11/18/15 – 4/29/16

Custodians: Jonathan Hirschfeld, Gerry Flynn, Stephen McIlwraith, Hitean Parmar, Eitan Zamir

Search terms: (Valeant OR Philidor) w/30 Davenport
(Valeant OR Philidor) w/30 “west wilshire”
philidorrxservices*
(Philidor w/30 (accounting w/2 (acquisition OR segment OR merger OR polic* OR procedure OR goodwill OR error OR control)))
(Valeant OR Philidor) w/30 “ASC 810”
(Philidor w/30 (audit w/5 committee))
(Valeant OR Philidor) w/30 (bonus w/2 (sales OR revenue OR target))
(Valeant OR Philidor) w/30 “captive pharmac*”
(Valeant OR Philidor) w/30 (channel w/2 stuff*)
(Valeant OR Philidor) w/30 (earnings w/2 (release OR guidance))
(Valeant OR Philidor) w/30 (exchange w/2 (polic* OR rights OR inventory OR terms))
(Valeant OR Philidor) w/30 FD, (greg* w/2 blaszczynski)
(Valeant OR Philidor) w/30 irregul*
Isolani
Iucena
(Valeant OR Philidor) w/30 (manipulat* w/2 (revenue OR sales OR “top line” OR “bottom line” OR earnings OR income))
(Valeant OR Philidor) w/30 mislead*
(Philidor w/30 (mismanag* OR misrep* OR misstate*))
(Valeant OR Philidor) w/30 (overstat* w/2 (revenue OR sales OR “top line” OR “bottom line” OR earnings OR income))
(Valeant OR Philidor) w/30 phantom
Philador*
Philedor*
Philidoor*
Philidor*
Phillidor*
Pillador*
R&O
(Valeant OR Philidor) w/30 (reconcil* w/5 gaap)
(Valeant OR Philidor) w/30 (red w/2 flag*)
(Valeant OR Philidor) w/30 (“Reg G” OR “Regulation G”)
(Valeant OR Philidor) w/30 (restat* w/5 (financial OR filing OR “balance sheet” OR income OR

June 26, 2018

Page 5

cash OR 10-K OR 10-Q OR annual OR quarter* OR earnings OR revenue
OR profit))
(Valeant OR Philidor) w/30 “rev rec”
(Philidor w/30 (revenue w/2 recognition))
(Valeant OR Philidor) w/30 (reverse w/5 (adjust* OR journal OR entry
OR accrual))
(Valeant OR Philidor) w/30 (russell w/2 reitz)
(Philidor w/30 “specialty pharmac*”)
(Valeant OR Philidor) w/30 (“variable interest entit*” OR VIE)
(Valeant OR Philidor) w/30 OGL
(Valeant OR Philidor) w/30 PB
(Valeant OR Philidor) w/30 Auto-refill
(Valeant OR Philidor) w/30 (Cash w/2 eps)
Medicis w/30 billing
(Valeant OR Philidor) w/30 “Operation green light”
(Valeant OR Philidor) w/30 (Organic w/2 growth)
(Valeant OR Philidor) w/30 “Philadelphia storefront”
(Valeant OR Philidor) w/30 “Primary beneficiary”
(Valeant OR Philidor) w/30 (Same w/2 store w/2 sales)
Philidor AND (Michael w/3 Pearson)
Philidor AND (Tanya w/3 Carro)
Philidor AND (Richard w/3 Wichansky)
Philidor AND (Howard w/3 Schiller)
Philidor AND (Carlos w/3 Cruz)
Philidor AND (Michael w/3 Bichler)
Philidor AND (Norma w/3 Provencio)
Philidor AND (Theo w/3 Melas-Kyriazi)
Philidor AND (Katharine w/3 Stevenson)
Philidor AND (Candice w/3 Cobb)
Philidor AND (Marc w/3 Padre), (Philidor w/30 Consolidat*)

June 26, 2018

Page 6

APPENDIX B

Date range: 1/1/2015 – 5/2/2016

Custodians: Jonathan Hirschfeld, Gerry Flynn, Stephen McIlwraith, Hitean Parmar, Eitan Zamir, Gary Sardo, Jon Gochoco, William Coffey, Matthew Magi, Alina Ramirez Pacheco, Ariel Miller, Brooke Zankel

Search terms: (Valeant OR VRX OR VPI) AND (“price appreciation” (not w/10 share OR stock)
(Valeant OR VRX OR VPI) AND “price appreciation credit”
(Valeant OR VRX OR VPI) AND “inventory appreciation”
(Valeant OR VRX OR VPI) AND “inventory management agreement”
(Valeant OR VRX OR VPI) AND PA w/2 credit
(Valeant OR VRX OR VPI) AND IMA w/2 fee
(Valeant OR VRX OR VPI) AND DSA w/2 (balance OR accrual)
(Valeant OR VRX OR VPI) AND FFS

EXHIBIT 7

KING & SPALDING

King & Spalding LLP
1700 Pennsylvania Avenue, NW
Washington, DC 20006-4707
Tel: +1 202 737 0500
Fax: +1 202 626 3737
www.kslaw.com

Kenneth Y. Turnbull
Partner
Direct Dial: +1 202 626 2644
kturnbull@kslaw.com

August 16, 2018

Via e-mail

Robert R. Henssler, Jr.
Robbins Geller Rudman & Dowd LLP
655 West Broadway, Suite 1900
San Diego, CA 92101

Re: *In re Valeant Pharmaceuticals International, Inc. Securities Litigation, No. 3:15-cv-07658-MAS-LHG*

Dear Bobby:

On behalf of PricewaterhouseCoopers LLP (“PwC”), we are producing additional documents in response to Plaintiffs’ First Request for Production of Documents, dated May 5, 2017 (“Plaintiffs’ First Request”). This production consists of documents that PwC has recently produced to one of the Investigative Agencies. Consistent with Jim Barz’s representation on November 28, 2017, this production and PwC’s prior productions in this action are not to be shared with the direct action plaintiffs.

First, we are producing e-mails and electronic documents identified based on the same custodians and using the same search terms set forth in Appendix A to PwC’s June 5, 2017 Responses for the date range January 1, 2013 to November 17, 2015. These documents bear the following Bates numbers:

Custodian	Bates Range
Flynn, Gerry	PwC VPI DNJ 00585383 - PwC VPI DNJ 00586935
Hirschfeld, Jonathan	PwC VPI DNJ 00586936 - PwC VPI DNJ 00588909
Mcilwraith, Stephen	PwC VPI DNJ 00588910 - PwC VPI DNJ 00606765
Parmar, Hitean	PwC VPI DNJ 00606766 - PwC VPI DNJ 00613611
Zamir, Eitan	PwC VPI DNJ 00613612 - PwC VPI DNJ 00618197

Second, we are producing e-mails and electronic documents identified based on the search parameters set forth in Appendix B to PwC’s June 26, 2018 letter. These documents bear the following Bates numbers:

August 16, 2018

Page 2

Custodian	Bates Range
William Coffey	PwC VPI DNJ 00550178 - PwC VPI DNJ 00550189
Gerry Flynn	PwC VPI DNJ 00550190 - PwC VPI DNJ 00553360
Jon Gochoco	PwC VPI DNJ 00553361 - PwC VPI DNJ 00553517
Jonathan Hirschfeld	PwC VPI DNJ 00553518 - PwC VPI DNJ 00559197
Matthew Magi	PwC VPI DNJ 00559198 - PwC VPI DNJ 00561135
Stephen Mcilwraith	PwC VPI DNJ 00561136 - PwC VPI DNJ 00562633
Ariel Miller	PwC VPI DNJ 00562634 - PwC VPI DNJ 00562926
Hitean Parmar	PwC VPI DNJ 00562927 - PwC VPI DNJ 00566771
Alina Ramirez	PwC VPI DNJ 00566772 - PwC VPI DNJ 00567553
Gary Sardo	PwC VPI DNJ 00567554 - PwC VPI DNJ 00582057
Eitan Zamir	PwC VPI DNJ 00582058 - PwC VPI DNJ 00583564
Brooke Zankel	PwC VPI DNJ 00583565 - PwC VPI DNJ 00585382

We have withheld certain documents on the grounds of PwC's attorney-client privilege and will provide a privilege log for such documents. Additionally, Valeant has asserted attorney work-product protection over certain documents and will also provide a log.

We are producing these documents via FTP in a multipart RAR file labeled PwC_VPI_DNJ_009, which includes fixed image TIFF, OCR text, and native Excel files, as well as load files compatible with Relativity, Concordance, and Summation. The self-extracting zip files are encrypted. We will provide the access information and password separately. Both the zip files and the TIFF images they contain have been marked "Confidential" pursuant to the terms of the July 18, 2017 Stipulation and Confidentiality Order and should be treated accordingly. Please note that, while it is impractical for us to label the native Excel files with a confidentiality designation, they are also confidential and should be treated as such. Please also note that these native files are subject to inadvertent alteration during the course of your review.

* * * *

PwC does not intend to, and does not, waive any applicable privilege or other legal basis under which information may not be subject to production, whether such privilege or protection is held by PwC or its clients. If it were found that production of any of the information contained herein constitutes disclosure of otherwise privileged matters, such disclosure would be inadvertent and subject to the claw-back provision in paragraph 2 of the Confidentiality Order.

August 16, 2018

Page 3

If you have any questions, please feel free to contact me.

Sincerely,

A handwritten signature in black ink, reading "Kenneth Y. Turnbull". The signature is written in a cursive, flowing style with a large initial 'K' and a distinct 'Y'.

Kenneth Y. Turnbull

EXHIBIT 8

KING & SPALDING

King & Spalding LLP
1700 Pennsylvania Avenue, NW
Washington, DC 20006-4707
Tel: +1 202 737 0500
Fax: +1 202 626 3737
www.kslaw.com

Kenneth Y. Turnbull
Partner
Direct Dial: +1 202 626 2644
kturnbull@kslaw.com

August 31, 2018

Via e-mail

Robert R. Henssler, Jr.
Robbins Geller Rudman & Dowd LLP
655 West Broadway, Suite 1900
San Diego, CA 92101

Re: *In re Valeant Pharmaceuticals International, Inc. Securities Litigation, No. 3:15-cv-07658-MAS-LHG*

Dear Bobby:

On behalf of PricewaterhouseCoopers LLP (“PwC”), we are producing the documents described in PwC’s Responses and Objections to Plaintiffs’ Second Request for Production of Documents (June 27, 2018), specifically: (1) the electronic workpaper database for Valeant’s March 2015 Stock Offering (PwC_VPI_DNJ_00618198 – 00620678) and associated hardcopy workpapers (PwC_VPI_DNJ_00620679 – 00621254); and (2) records that show which PwC professionals recorded time to PwC’s 2014 and 2015 audits and reviews of Valeant’s annual and quarterly financial statements (PwC_VPI_DNJ_00621255 – 00621255). Consistent with Jim Barz’s representation on November 28, 2017, this production and PwC’s prior productions in this action are not to be shared with the direct action plaintiffs. Counsel for Valeant has asserted privilege over certain documents and will provide a log.

We are producing the documents via FTP in a file labeled PwC_VPI_DNJ_010, which includes fixed image TIFF, OCR text, and load files compatible with Relativity, Concordance, and Summation. The self-extracting zip file is encrypted. We will provide the access information and password separately. Both the zip files and the TIFF images they contain have been marked “Confidential” pursuant to the terms of the July 18, 2017 Stipulation and Confidentiality Order and should be treated accordingly. While it is impractical for us to label the native Excel files with a confidentiality designation, they are also confidential and should be treated as such. Please note that these native files are subject to inadvertent alteration during the course of your review.

* * * *

August 31, 2018

Page 2

PwC does not intend to, and does not, waive any applicable privilege or other legal basis under which information may not be subject to production, whether such privilege or protection is held by PwC or its clients. If it were found that production of any of the information contained herein constitutes disclosure of otherwise privileged matters, such disclosure would be inadvertent and subject to the claw-back provision in paragraph 2 of the Confidentiality Order.

If you have any questions, please feel free to contact me or Christina Conroy (212-556-2123).

Sincerely,

A handwritten signature in black ink, reading "Kenneth Y. Turnbull". The signature is written in a cursive, flowing style.

Kenneth Y. Turnbull

EXHIBIT 9

KING & SPALDING

King & Spalding LLP
1700 Pennsylvania Avenue, NW
Washington, DC 20006-4707
Tel: +1 202 737 0500
Fax: +1 202 626 3737
www.kslaw.com

Kenneth Y. Turnbull
Partner
Direct Dial: +1 202 626 2644
kturnbull@kslaw.com

November 26, 2019

Via e-mail

Robert R. Henssler, Jr.
Robbins Geller Rudman & Dowd LLP
655 West Broadway, Suite 1900
San Diego, CA 92101

Re: *In re Valeant Pharmaceuticals International, Inc. Securities Litigation, No. 3:15-cv-07658-MAS-LHG*

Dear Bobby:

On behalf of PricewaterhouseCoopers LLP (“PwC”), we are producing additional documents in response to Plaintiffs’ First Request for Production of Documents, dated May 5, 2017. This production consists of documents that PwC has produced to one of the Investigative Agencies since our last production on August 31, 2018. As with our prior productions in this action, this production is not to be shared with the direct action plaintiffs.

First, we are producing additional e-mails and electronic documents identified based on the same custodians and using the same search terms set forth in Appendix A to PwC’s June 5, 2017 Responses for the date range January 1, 2013 to April 29, 2016. We are producing these documents via FTP in a multipart RAR file labeled PwC_VPI_DNJ_011. These documents bear the following Bates numbers:

Custodian	Bates Range
Flynn, Gerry	PwC VPI DNJ 00621256 - PwC VPI DNJ 00622262
Hirschfeld, Jonathan	PwC VPI DNJ 00622263 - PwC VPI DNJ 00627390
Mcilwraith, Stephen	PwC VPI DNJ 00627391 - PwC VPI DNJ 00636439
Parmar, Hitean	PwC VPI DNJ 00636440 - PwC VPI DNJ 00645917
Zamir, Eitan	PwC VPI DNJ 00645918 - PwC VPI DNJ 00662590

We have withheld certain documents and redacted certain information on the grounds of PwC’s attorney-client privilege and will provide a privilege log for such documents. Additionally, Valeant has asserted attorney work-product protection over certain documents and will also provide a log.

November 26, 2019

Page 2

Second, we are producing overlay files for 41 documents that had been redacted or withheld from PwC's prior productions based on Valeant's assertions of attorney work-product protection. Valeant's counsel has now determined that these documents do not contain protected information or has reduced the extent of redactions previously applied. We have listed the Bates numbers for these documents in the Appendix below. We are producing these overlay files via FTP in a RAR file labeled PwC_VPI_DNJ_012.

The files labeled PwC_VPI_DNJ_011 and PwC_VPI_DNJ_012 include fixed image TIFF, OCR text, and native Excel files, as well as load files compatible with Relativity, Concordance, and Summation. The self-extracting zip files are encrypted. We will provide the access information and password separately.

The materials we are producing are confidential. Both the zip files and the TIFF images they contain have been marked "Confidential" pursuant to the terms of the July 18, 2017 Stipulation and Confidentiality Order and should be treated accordingly. Please note that, while it is impractical for us to label the native Excel files with a confidentiality designation, they are also confidential and should be treated as such. Please also note that these native files are subject to inadvertent alteration during the course of your review.

* * * *

PwC does not intend to, and does not, waive any applicable privilege or other legal basis under which information may not be subject to production, whether such privilege or protection is held by PwC or its clients. If it were found that production of any of the information contained herein constitutes disclosure of otherwise privileged matters, such disclosure would be inadvertent and subject to the claw-back provision in paragraph 2 of the Confidentiality Order.

If you have any questions, please feel free to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Kenneth Y. Turnbull". The signature is fluid and cursive, with the first name "Kenneth" and last name "Turnbull" clearly distinguishable.

Kenneth Y. Turnbull

Enclosures

November 26, 2019

Page 3

Appendix

Custodian/Electronic Work Paper Database	Bates Numbers
Jonathan Hirschfeld	PwC_VPI_DNJ_00498182 - PwC_VPI_DNJ_00498186 PwC_VPI_DNJ_00498205 - PwC_VPI_DNJ_00498209 PwC_VPI_DNJ_00498283 - PwC_VPI_DNJ_00498299 PwC_VPI_DNJ_00498315 - PwC_VPI_DNJ_00498332 PwC_VPI_DNJ_00553902 - PwC_VPI_DNJ_00553920 PwC_VPI_DNJ_00553965 - PwC_VPI_DNJ_00553984 PwC_VPI_DNJ_00554061 - PwC_VPI_DNJ_00554079 PwC_VPI_DNJ_00554094 - PwC_VPI_DNJ_00554113 PwC_VPI_DNJ_00556345 - PwC_VPI_DNJ_00556364 PwC_VPI_DNJ_00556379 - PwC_VPI_DNJ_00556397
Hitean Parmar	PwC_VPI_DNJ_00512687 - PwC_VPI_DNJ_00512698 PwC_VPI_DNJ_00512699 - PwC_VPI_DNJ_00512886 PwC_VPI_DNJ_00512887 - PwC_VPI_DNJ_00512914 PwC_VPI_DNJ_00512915 - PwC_VPI_DNJ_00513100 PwC_VPI_DNJ_00513101 - PwC_VPI_DNJ_00513114 PwC_VPI_DNJ_00513868 - PwC_VPI_DNJ_00513879 PwC_VPI_DNJ_00513880 - PwC_VPI_DNJ_00514067 PwC_VPI_DNJ_00514068 - PwC_VPI_DNJ_00514095 PwC_VPI_DNJ_00514096 - PwC_VPI_DNJ_00514281 PwC_VPI_DNJ_00514282 - PwC_VPI_DNJ_00514295 PwC_VPI_DNJ_00515600 - PwC_VPI_DNJ_00515614
Gary Sardo	PwC_VPI_DNJ_00579010 - PwC_VPI_DNJ_00579027 PwC_VPI_DNJ_00579043 - PwC_VPI_DNJ_00579061 PwC_VPI_DNJ_00579495 - PwC_VPI_DNJ_00579513 PwC_VPI_DNJ_00579528 - PwC_VPI_DNJ_00579546 PwC_VPI_DNJ_00579561 - PwC_VPI_DNJ_00579580 PwC_VPI_DNJ_00579595 - PwC_VPI_DNJ_00579613 PwC_VPI_DNJ_00581453 - PwC_VPI_DNJ_00581453.0000028
Eitan Zamir	PwC_VPI_DNJ_00539324 - PwC_VPI_DNJ_00539325 PwC_VPI_DNJ_00539326 - PwC_VPI_DNJ_00539328 PwC_VPI_DNJ_00540842 - PwC_VPI_DNJ_00540846 PwC_VPI_DNJ_00547541 - PwC_VPI_DNJ_00547542 PwC_VPI_DNJ_00547584 - PwC_VPI_DNJ_00547586 PwC_VPI_DNJ_00582664 - PwC_VPI_DNJ_00582700
Valeant Pharmaceuticals International, Inc. 2015 Audit	PwC_VPI_DNJ_00121922 - PwC_VPI_DNJ_00121935 PwC_VPI_DNJ_00135148 - PwC_VPI_DNJ_00135155 PwC_VPI_DNJ_00135982 - PwC_VPI_DNJ_00135986 PwC_VPI_DNJ_00136676 - PwC_VPI_DNJ_00136690 PwC_VPI_DNJ_00136923 - PwC_VPI_DNJ_00136937
Valeant Pharmaceuticals International, Inc. 2015 Audit – Ad Hoc Committee	PwC_VPI_DNJ_00146328 - PwC_VPI_DNJ_00146353 PwC_VPI_DNJ_00151860 - PwC_VPI_DNJ_00151869

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via e-mail on all counsel listed on the attached service list on this 19th day of March, 2020:

/s/ Christopher A. Seeger
CHRISTOPHER A. SEEGER

Service List

In re Valeant Pharmaceuticals International, Inc. Securities Litigation,
No. 3:15-cv-07658-MAS-LHG (D.N.J.)

<p>Darren J. Robbins ROBBINS GELLER RUDMAN & DOWD LLP 655 West Broadway, Suite 1900 San Diego, CA 92101 Telephone: 619/231-1058 619/231-7423 (fax)</p> <p>James E. Barz Brian E. Cochran Frank A. Richter ROBBINS GELLER RUDMAN & DOWD LLP 200 South Wacker Drive, 31st Floor Chicago, IL 60606 Telephone: 312/674-4674 312/674-4676 (fax)</p> <p>Jack Reise Robert J. Robbins Kathleen B. Douglas ROBBINS GELLER RUDMAN & DOWD LLP 120 East Palmetto Park Road, Suite 500 Boca Raton, FL 33432 Telephone: 561/750-3000 561/750-3364 (fax)</p>	<p><i>Lead Counsel for Plaintiffs</i></p>	<p>Valeant@rgrdlaw.com</p>
<p>Christopher A. Seeger David R. Buchanan Jennifer Scullion SEEGER WEISS LLP 55 Challenger Road, 6th Floor Ridgefield Park, NJ 07660 Telephone: 973/639-9100 973/639-9393 (fax)</p>	<p><i>Local Counsel for Plaintiffs</i></p>	<p>cseeger@seegerweiss.com dbuchanan@seegerweiss.com jscullion@seegerweiss.com</p>

<p>Richard Hernandez Omar Barentto McCARTER & ENGLISH, LLP Four Gateway Center 100 Mulberry Street Newark, NJ 07102 Telephone: 973/622-4444 973/297-6615 (fax)</p> <p>Paul C. Curnin Jonathan K. Youngwood Craig S. Waldman Daniel J. Stujenske Dean McGee Kavitha S. Sivashanker SIMPSON THACHER & BARTLETT LLP 425 Lexington Avenue New York, NY 10017 Telephone: 212/455-2641 212/455-2502 (fax)</p>	<p><i>Attorneys for Valeant Pharmaceuticals International, Inc., Robert L. Rosiello, Ari S. Kellen, Ronald H. Farmer, Colleen Goggins, Robert A. Ingram, Theo Melas- Kyriazi, Robert N. Power, Norma Provencio, Katherine B. Stevenson and Jeffrey Ubben</i></p>	<p>List-Defendants- Valeant@lists.stblaw.com</p>
---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	------------------------------------------------------

<p>James J. Capra, Jr. Evan Claire Ennis Christina M. Conroy James P. Cusick KING & SPALDING LLP 1185 Avenue of the Americas New York, NY 10036-4003 Telephone: 212/556-2100 212/556-2222 (fax)</p> <p>Kenneth Y. Turnbull KING & SPALDING LLP 1700 Pennsylvania Avenue, NW Washington, DC 20006-4707 Telephone: 202/737-0500 202/626-3737 (fax)</p> <p>A. Ross Pearlson Ilana Levin CHIESA SHAHINIAN & GIANTOMASI PC One Boland Drive West Orange, NJ 07052 Telephone: 973/325-1500 973/325-1501 (fax)</p>	<p><i>Attorneys for Defendant PricewaterhouseCoopers LLP</i></p>	<p>jcapra@kslaw.com eennis@kslaw.com kturnbull@kslaw.com cconroy@kslaw.com jcusick@kslaw.com adepalma@kslaw.com jcmccullough@kslaw.com shosein@kslaw.com</p> <p>rpearlson@csglaw.com ilevin@csglaw.com</p>
----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	----------------------------------------------------------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

<p>Bruce E. Yannett Matthew J. Petrozziello DEBEVOISE & PLIMPTON LLP 919 Third Avenue New York, NY 10022 Telephone: 212/909-6000 212/909-6836 (fax)</p> <p>Jonathan R. Tuttle Ada Fernandez Johnson Anna Moody Mark D. Flinn Meredith E. Stewart DEBEVOISE & PLIMPTON LLP 801 Pennsylvania Avenue N.W. Washington, D.C. 20004 Telephone: 202/383-8000 202/383-8118 (fax)</p>	<p><i>Attorneys for Defendant J. Michael Pearson</i></p>	<p>beyannett@debevoise.com mjpetrozziello@debevoise.com afjohnson@debevoise.com jrtuttle@debevoise.com amoody@debevoise.com mflinn@debevoise.com mestewart@debevoise.com</p>
<p>Richard A. Rosen Maxwell Kosman William E. Freeland PAUL, WEISS, RIFKIND, WHARTON & GARRISON LLP 1285 Avenue of the Americas New York, NY 10019-6064 Telephone: 212/373-3000 212/492-0305 (fax)</p> <p>Mark A. Berman Robin D. Fineman Jeremy B. Stein HARTMANN DOHERTY ROSA BERMAN & BULBULIA, LLC 65 Route 4 East River Edge, New Jersey 07661 Telephone: 201/441-9056 201/441-9435 (fax)</p>	<p><i>Attorneys for the Bank Offering Defendants</i></p>	<p>rrosen@paulweiss.com mkosman@paulweiss.com wfreeland@paulweiss.com</p> <p>mberman@hdrbb.com rfineman@hdrbb.com jstein@hdrbb.com</p>

Barry A. Bohrer Robert E. Griffin SCHULTE ROTH & ZABEL LLP 919 Third Avenue New York, NY 10022 Telephone: 212/756-2000 212/593-5955 (fax)	<i>Attorneys for Defendant Deborah Jorn</i>	barry.bohrer@srz.com robert.griffin@srz.com
Benjamin Sokoly WINSTON & STRAWN LLP 200 Park Avenue New York, NY 10166 Telephone: 212/294-6700 212/294-4700 (fax) Robert Y. Sperling Joseph L. Motto Katherine Hundt WINSTON & STRAWN LLP 35 West Wacker Drive Chicago, IL 60601 Telephone: 312/558-5600 312/558-5700 (fax)	<i>Attorneys for Defendant Howard B. Schiller</i>	bsokoly@winston.com jmotto@winston.com rsperling@winston.com khundt@winston.com
William J. Schwartz Lauren Gerber Lee Kaitland Kennelly Sarah Lightdale COOLEY LLP 1114 Avenue of the Americas New York, NY 10036 Telephone: 212/479-6000 212/479-6275 (fax) Richard Hernandez Omar Barentto McCARTER & ENGLISH, LLP Four Gateway Center 100 Mulberry Street Newark, NJ 07102 Telephone: 973/622-4444 973/624-7070 (fax)	<i>Attorneys for Defendant Tanya Carro</i>	wschwartz@cooley.com lglee@cooley.com kkennelly@cooley.com slightdale@cooley.com rhernandez@mccarter.com obarentto@mccarter.com

<p>Jonathan Rosenberg Allen Burton Dimitri D. Portnoi O'MELVENY & MYERS LLP Times Square Tower 7 Times Square New York, NY 10036-6537 Telephone: 212/326-2000 212/326-2061 (fax)</p> <p>Margaret L. Carter Dimitri D. Portnoi Michael J. Simeone O'MELVENY & MYERS LLP 400 South Hope Street Los Angeles, CA 90071 Telephone: 213/430-6000 213/430-6407 (fax)</p> <p>Kevin G. Walsh Kate E. Janukowicz GIBBONS P.C. One Gateway Center Newark, NJ 07102 Telephone: 973/596-4500 973/596-0545 (fax)</p>	<p><i>Attorneys for Defendants ValueAct Capital Management L.P., ValueAct Capital Master Fund, L.P., ValueAct Co- Invest Master Fund, L.P., VA Partners I, LLC ValueAct Holdings, L.P. and Jeffrey W. Ubben</i></p>	<p>jrosenberg@omm.com aburton@omm.com mcarter@omm.com dportnoi@omm.com msimeone@omm.com</p> <p>kwalsh@gibbonslaw.com kjanukowicz@gibbonslaw.com</p>
-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------